

PRIVACY POLICY

Last update: 21.08.2023

I. Introduction

Danil Sergeev, Av. Alm. Reis 108, 1170-140, Lisbon (hereinafter “Controller” or “our” or “we” or “us”) is the responsible party for the processing of personal data collected through your use of our website yasp.fi, associated website APIs, together with any applications, including mobile applications, and the services accessible via the website (collectively, the “Website”) as per protection laws.

This privacy policy (“Privacy Policy”) describes how and why we collect, store, use, and manage the information, and data, including personal data, that you provide or we collect when you visit and use our Website. It also tells you how you can access and update and/or data and make certain choices about how personal information and/or data that you provide to us is used.

By accessing our Website and using the services, you accept the terms of this Privacy Policy. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access our Website or use of the services.

We may update or modify this Privacy Policy from time to time and will alert you that changes have been made by indicating on the Privacy Policy the date it was last updated at the top of this Privacy Policy, prominently posting an announcement of the changes on our Website, or by sending you a written communication using the contact information you provided us prior to the new policy taking effect. Users are bound by any changes to the Privacy Policy if they use our Website after notice of such changes has been communicated. We encourage you to review this Privacy Policy regularly to ensure that you are familiar with the Controller's current practices.

II. How we process your personal data

1. Principles of Personal Data processing

We are committed to protecting the privacy and security of Personal Data entrusted to us by you. In order to ensure transparency and compliance with applicable data protection laws and regulations, we adhere to the following principles of personal data processing:

Lawfulness, Fairness, and Transparency: we process personal data in a lawful, fair, and transparent manner. We ensure that you are aware of the purposes for which your Personal Data is collected, used, and disclosed. We also inform you about rights and provide with clear and easily understandable information about our data processing practices.

Purpose Limitation: we collect Personal Data for specified, explicit, and legitimate purposes,

and we do not process Personal Data in a manner that is incompatible with those purposes. We only collect and use Personal Data to the extent necessary to fulfill the stated purposes and in accordance with the consent obtained, contractual obligations, compliance with legal obligations or legitimate interests.

Data Minimization: we only collect and process Personal Data that is adequate, relevant, and limited to what is necessary for the purposes for which it is processed. We strive to minimize the amount of Personal Data we collect and retain, ensuring that the data is accurate, up-to-date, and necessary for the intended purposes.

Accuracy: we take reasonable steps to ensure the accuracy of Personal Data and keep it up-to-date. We rely on you to provide accurate and complete information, and we provide mechanisms to update or correct their Personal Data when necessary.

Storage Limitation: we retain Personal Data only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by law. When Personal Data is no longer needed, we securely delete or anonymize it to prevent unauthorized access or use.

Integrity and Confidentiality: we implement appropriate technical and organizational measures to protect Personal Data against unauthorized access, accidental loss, alteration, or disclosure. We maintain the confidentiality, integrity, and availability of Personal Data through physical, technical, and administrative safeguards.

Accountability: we take responsibility for our data processing activities and have implemented measures to ensure compliance with applicable data protection laws. We maintain records of our data processing activities, conduct regular assessments of our privacy practices, and provide training to our employees on privacy and data protection.

It is important to note that these principles guide our approach to Personal Data processing, and we continuously review and update our practices to ensure ongoing compliance with evolving legal and regulatory requirements.

2. Scope

We only process your personal data if this is necessary to provide a functional Website or to provide you with our contents and services. The processing of personal data only takes place based on the appropriate legal basis and as permitted by law.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website or otherwise when you contact us. The personal information that we

collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use.

The personal information we may collect is described below:

Personal Information provided by you: we collect email addresses and other similar information.

Information collected from other sources:

- We may use Sentry, an error tracking tool in provision of our services so that we can better track software bugs and fix them as soon as possible. Sentry's privacy policy is available here: <https://sentry.io/privacy/>
- We may use Cloudflare, a security and performance suite that provides distributed denial of service (DDoS) mitigation and Internet security services, in some of our Services. Cloudflare's privacy policy is available here: <https://www.cloudflare.com/en-gb/privacypolicy/>
- We may use Google Analytics, a web analysis service, to help us offer an optimized user experience. More information about Google Analytics' use of your personal data is available here: <https://marketingplatform.google.com/about/analytics/terms/gb/>
- We may use Mixpanel, an event tracking tool, in some of our services so that we can better understand how you use our sites and services. Mixpanel's privacy policy is available here: <https://mixpanel.com/legal/privacy-policy>

3. Legal basis for processing under GDPR

We use following legal bases when processing your Personal Data.

Processing necessary for the performance of the contract between you and us or in order to take steps at your request prior to entering into a contract with us (Article 6(1)(b) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR)).

We may process data on this basis for the following purposes:

- To create and manage user accounts, ensuring access to the Website services.
- To generate and manage wallet addresses.
- To provide customer support and address user inquiries related to Website usage.

Processing necessary for compliance with legal obligations (Article 6(1)(c) GDPR).

We may process data on this basis for the following purposes:

- Anti-Money Laundering (AML) Compliance: to verify user identity and fulfill AML requirements
- Regulatory Reporting: to compile and submit required reports to regulatory authorities.

Processing necessary to protect our legitimate interests (Article 6(1)(f) GDPR).

We may process data on this basis for the following purposes:

- To identify and prevent fraudulent activities.
- To implement security measures that protect user funds and sensitive information.
- For analytics to improve the Website functionality and user experience.
- To send promotional offers and updates about Website.

Processing based on your consent (Article 6(1)(a) GDPR).

We may process data on this basis for the following purposes:

- Customized services: to offer personalized experiences based on individual preferences.
- Data Sharing with partners: to share specific information with third-party partners for integrated services.

III. Automated Data Processing and Cookies

1. Automated Data Processing

Every time you visit our Website, our system automatically collects data and information about the computer system you used to access our Website.

The following data may be collected:

- Browser information (type and version);
- Operating system;
- Your internet service provider;
- Your IP address;
- Date and time of access;
- Websites from which your system reaches our Website;
- Websites accessed by the user's system via our Website.

The data is also stored in the log files of our system. This data is not stored together with your other personal data.

The data is stored in log files serves the purpose of to ensuring the functionality of the Website. In addition, the data serves us to optimize the Website and to ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context.

For data processing subject to GDPR, the legal basis for the temporary storage of data and log files is our legitimate interests (Article 6(1)(f) GDPR).

2. Cookies

We use cookies on our Website. Cookies are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone, etc.) when you visit our Website. Information is stored in the cookie that results in each case in connection with the specifically used terminal device. However, this does not mean that we immediately become aware of your identity. The use of cookies primarily serves the purpose of making your use of our Website more pleasant for you. For example, we use so-called session cookies to recognize that you have already visited individual pages of our Website.

In addition, we also use temporary cookies that are stored on your end device for a specified period of time to optimize user-friendliness. If you visit our Website again to use our services, it will automatically recognize that you have already been with us and what entries and settings you have made so that you do not have to enter them again.

Furthermore, we use cookies to statistically record the use of our Website and to evaluate it for you for optimizing our Website. These cookies enable us to automatically recognize when you return to our Website that you have already been with us. These cookies are automatically deleted after a defined period of time.

Within the scope of the GDPR, the data processed by cookies for the aforementioned purposes is justified in order to protect our legitimate interests and those of third parties pursuant to Article 6(1)(f) GDPR.

IV. Data Transfer

We store personal information about you on our servers in the EU. However, as part of our Business partners is outside EEA, your personal information may be processed by recipients outside of the EEA, which is not subject to an adequacy decision by the European Commission and which does not provide for the same level of data protection as in the EEA. In this event, we will ensure that the recipient of your personal information offers an adequate level of protection, for instance by entering into Standard Contractual Clauses for the transfer of data as approved by the European Commission (Article 46 GDPR), your explicit consent to such international data transfers or based on the performance of the contract. This way, if we transfer Personal Data collected from users located within the EU to a third-party acting as a data processor, such third-party processes your personal information in a manner consistent with the GDPR.

You may obtain a copy of the documents we use to protect your personal data when it is transferred outside the EEA by contacting us via email at privacy@yasp.fi.

V. Your Rights

You have the following rights under the applicable data protection laws:

Information and Access. The right to know whether your Personal Data is being processed, right to get information regarding processing of personal data, right to request a copy of Personal Data being processed. The right to information about public and private entities with which we have shared data.

Rectification (correction). The right to correct your Personal Data in a situation when such data available to us or disclosed to third parties is inaccurate or incomplete.

Erasure. The right to request deletion of Your Personal Data from Our database so that the Service is not able to continue processing and storing of such data, with exceptions, provided in applicable law.

Restrict processing. The right to introduce the restriction regime on the processing of Your Personal Data, so that in each case the data may be processed only upon your separate consent.

Data portability. The right to request for the Personal Data to be given in a machine-readable format so that it could be transferred to another service provider or transfer directly to a third party designated by you.

Object. The right to object to processing of your Personal Data in a case when the corresponding processing is not performed on the basis of your consent.

Withdraw consent. Right to withdraw consent to processing of your Personal Data by us or third parties to which we have previously disclosed your Personal Data.

VI. Duration of processing and security

We only store your personal data for as long as necessary to serve the purpose of the processing and we delete personal data or block access to it as soon as such purpose ceases to apply.

Furthermore, personal data may be stored if this has been provided for by the applicable law (for example for book keeping or mandatory archiving purposes). The data will also be blocked or deleted if a storage period prescribed by the applicable law expires, unless there is a need for further storage of the data for the conclusion or fulfilment of a contract.

We have implemented reasonable technical and organizational precautions to protect the confidentiality, security and integrity of your personal information from accidental or unlawful destruction, loss, alteration, disclosure, or unauthorized access. We cannot guarantee the security of information transmitted to us over the internet.

VII. Protecting Children's Privacy

Our Website does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers. If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

In accordance with California law, minors under the age of eighteen (18) residing in California may remove, or request and obtain the removal of, content and information that they share on the Websites. To remove or to request and obtain the removal of such content and information, the user must email privacy@yasp.fi. Users should be aware that removing content and information posted by a minor does not ensure complete or comprehensive erasure of content or information posted on the Website.

VIII. Privacy Notice for California Residents

Last update: 21.08.2023

This Privacy Notice for California Residents (this "Privacy Notice") supplements the information contained in **Danil Sergeev** ("Controller", "us" or "our", or "we") Privacy Policy and applies solely to all visitors, Users and others who reside in the State of California ("consumers", "you" or "your"). We adopt this Privacy Notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this Privacy Notice. All capitalized terms not herein defined will have the meaning set forth in Privacy Policy. In case on any inconsistencies with Privacy Policy, this Privacy Notice shall prevail.

1. INFORMATION WE COLLECT

1.1. We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information").

1.2. In particular, we have collected the following categories of personal information from our consumers within the last 24 months:

A. Identifiers.

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e)).

C. Commercial information.

D. Internet or other similar network activity.

1.3. Personal information does not include:

- (i) Publicly available information from government records;
- (ii) De-identified or aggregated consumer information;
- (iii) Information excluded from the CCPA's scope, like:
 - i. health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - ii. personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

1.4. We obtain the categories of personal information listed above from the following categories of sources:

- (i) Directly from our consumers or their agents.
- (ii) Directly from you when you provide it to us.
- (iii) Indirectly from you.
- (iv) From third parties, for example, our service providers.

2. USE OF PERSONAL INFORMATION

2.1. We may use or disclose the personal information we collect for one or more of the following purposes:

- (i) To fulfill or meet the reason for which you provided the information. For example, if you share your name and contact information to ask a question about our Website we will use that personal information to respond to your inquiry.
- (ii) To provide, support, personalize and develop our Website.
- (iii) To process your requests and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- (iv) To notify you about changes to our Website or services we offer or provide through our Website.
- (v) To notify you about changes to our policies and/or terms of use.
- (vi) To maintain a record of our dealings with you.
- (vii) To understand and analyze the usage trends and preferences of our users, to improve our Website and to develop new features, and functionality.
- (viii) To contact you for administrative and information purposes - this may include providing customer service or sending communications, including changes to our terms of use.
- (ix) To engage features of third party social networks.

- (x) For testing, research, analysis and product development.
- (xi) To help maintain the safety, security, and integrity of our Website and our databases, other technology assets and business.
- (xii) To diagnose or fix technological problems in relation to our Website.
- (xiii) To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- (xiv) To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- (xv) To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- (xvi) As described to you when collecting your personal information or as otherwise set forth in the CCPA.

3. SHARING PERSONAL INFORMATION

3.1. We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

3.2. We disclose your personal information for a business purpose to the following categories of third parties:

- (i) Our affiliates.
- (ii) Service providers.
- (iii) Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
- (iv) Law enforcement bodies and courts.

3.3. We share your personal information for the following general purposes:

- (i) Service Providers: We may disclose personal information to third-party service providers that assist us with our operations. For example, analytics, log management, payment processing and data storage and processing services.
- (ii) Protecting our Rights: We may disclose personal information to third parties if We believe that doing so is legally required or is in Our interest to protect Our property or other legal rights (including, but not limited to, enforcement of Our agreements), or the rights or property of others.
- (iii) Corporate Transaction: Personal information may be disclosed as part of a corporate transaction, such as a merger, acquisition, debt financing, sale of Controller's assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which personal information could be transferred to third parties as one of our business assets.

3.4. In the preceding twelve (12) months, we have not sold any personal information.

4. YOUR RIGHTS AND CHOICES

4.1. The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

4.2. Access to Specific Information and Data Portability Rights.

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see "Exercising Access, Data Portability, and Deletion Rights" section), we will disclose to you:

- (i) The categories of personal information we collected about you.
- (ii) The categories of sources for the personal information we collected about you.
- (iii) Our business or commercial purpose for collecting and selling that personal information.
- (iv) The categories of third parties with whom we share that personal information.
- (v) The specific pieces of personal information we collected about you (also called a data portability request).
- (vi) If we disclosed your personal information for a business purpose, a list with disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

4.3. Deletion Request Rights.

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see "Exercising Access, Data Portability, and Deletion Rights" section), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- (i) Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you or otherwise perform our contract with you.
- (ii) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- (iii) Debug products to identify and repair errors that impair existing intended functionality.

- (iv) Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- (v) Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- (vi) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- (vii) Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- (viii) Comply with a legal obligation.
- (ix) Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

4.4. Exercising Access, Data Portability, and Deletion Rights.

4.4.1. To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to us by email: privacy@yasp.fi

4.4.2. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

4.4.3. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- (i) Provide sufficient information that allows Us to reasonably verify that you are the person about whom We collected personal information or an authorized representative of such person; and
- (ii) Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

4.4.4. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

4.4.5. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

4.5. Response Timing and Format

4.5.1 We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension

period in writing.

4.5.2. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

4.5.3. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why We made that decision and provide you with a cost estimate before completing your request.

4.6. Personal Information Sales Opt-Out and Opt-In Rights.

4.6.1. If you are a California resident and 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless We receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

4.6.2. To exercise the right to opt-out, you (or your authorized representative) shall submit a variable notice to privacy@yasp.fi

4.6.3. Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales.

5. NON-DISCRIMINATION

5.1. We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, We will not:

- (i) Deny you goods or services.
- (ii) Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- (iii) Provide you a different level or quality of goods or services.
- (iv) Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

6. CHANGES TO OUR PRIVACY NOTICE

6.1. We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will post the updated Privacy Notice on the Website as part of Privacy Policy and update the Privacy Notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

IX. How to contact us

If you have any questions about this Privacy Policy and Privacy Notice, or implement your rights, you can contact us by email: privacy@yasp.fi